

**CHARLES SCHWAB & CO., INC. AND SCHWAB HOLDINGS, INC.'S  
OPPOSITION TO DOCKET ENTRY NO. 135**

Plaintiff's repetitive filings have crossed the line from burdensome to vexatious. *Cf.* Dkt. No. 102 ("Plaintiff is also warned of vexatious filings."). Plaintiff has already moved for reconsideration of the Court's order staying his claims against Schwab in favor of arbitration (Dkt. No. 117). Schwab has already opposed that motion (Dkt. No. 124). Plaintiff's newest filing merely recapitulates Plaintiff's

scurrilous misstatements about Schwab supposedly “destroying emails and audio recordings.” Plaintiff’s assertions are false, made without any evidentiary support, and oblivious to the documents and legal authorities Schwab provided in conjunction with Dkt. No. 124. Insofar as it raises comprehensible argument, Plaintiff’s motion is also irreconcilable with Plaintiff’s acknowledged—and signed—agreement to arbitrate with TD Ameritrade “and its successors,” including Schwab. *See* Dkt. Nos. 8-5 & 8-6. (Plaintiff also accepted a second, equally operative arbitration agreement directly with Schwab. *See* Dkt. Nos. 8-7 & 8-8.) Nothing in Plaintiff’s latest submission is previously unknown or previously unconsidered.

Throughout this proceeding, the Court and Schwab have treated Plaintiff with respect and patience. Plaintiff has responded to that solicitude by acting, repeatedly, in a manner inconsistent with Fed. R. Civ. P. 1 and Fed. R. Civ. P. 11. In a case involving total alleged losses of \$2935, *see* Dkt. No. 4 at ¶ 43, based on an Internet conspiracy theory, *see* Dkt. No. 68 at 2, Plaintiff has now filed approximately seventeen separate motions (not including procedural motions), none of which have been granted.

Schwab respectfully requests that the Court deny Plaintiff’s motion at Dkt. No. 135, prohibit Plaintiff from filing any further motions involving Schwab without leave of Court, and relieve Schwab of any obligation to respond to further submissions by Plaintiff (unless Schwab’s response is requested by the Court).

DATED at Burlington, Vermont, this 10th day of March 2025.

By: /s/ Justin B. Barnard

Justin B. Barnard, Esq.  
Anne B. Rosenblum, Esq.  
**DINSE P.C.**  
209 Battery Street  
Burlington, VT 05401  
Tel: (802) 864-5751  
jbarnard@dinse.com  
arosenblum@dinse.com

Jeff Goldman, Esq. (admitted *pro hac vice*)  
Felipe Escobedo, Esq. (admitted *pro hac vice*)  
**MORGAN, LEWIS & BOCKIUS LLP**  
One Federal Street  
Boston, MA 02110  
Tel: (617) 341-7700  
jeff.goldman@morganlewis.com  
felipe.escobedo@morganlewis.com

*Counsel for Charles Schwab & Co., Inc. and  
Schwab Holdings, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2025, the foregoing document is being filed through the CM/ECF system and that a copy of the same will be sent electronically to all registered participants.

By: /s/ Justin B. Barnard

Justin B. Barnard, Esq.  
**DINSE P.C.**  
209 Battery Street  
Burlington, VT 05401  
Tel: (802) 864-5751  
jbarnard@dinse.com